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18 UNITED STATES DISTRICT COURT

19 DISTRICT OF NEVADA

20 Cung Le, Nathan Quarry, Jon Fitch, Brandon
21 Vera, Luis Javier Vazquez, and Kyle
22 Kingsbury on behalf of themselves and all
others similarly situated,

23 Plaintiffs,

24 v.

25 Zuffa, LLC, d/b/a Ultimate Fighting
26 Championship and UFC,

27 Defendant.
28

Case No.: 2:15-cv-01045-RFB-(PAL)

**JOINT MOTION TO SEAL
PLAINTIFFS' OPPOSITION TO
ZUFFA, LLC'S MOTION TO
SEAL ZUFFA'S REPLY IN
SUPPORT OF SUMMARY
JUDGMENT (ECF NO. 619)**

1 When Defendant Zuffa, LLC (“Zuffa”) filed its Reply in Support of its Motion for
2 Summary Judgment on November 2, 2018 (ECF No. 611) (“Reply”), it concurrently filed a
3 Motion to Seal Zuffa, LLC’s Reply in Support of Summary Judgment and Related Materials
4 (ECF No. 614) (“Motion to Seal”). On November 16, 2018, Plaintiffs filed their Opposition to
5 Defendant Zuffa, LLC’s Motion to Seal Zuffa’s Reply in Support of Zuffa’s Motion for Summary
6 Judgment (ECF No. 619) (“Opposition”). The Reply and the Opposition include, refer to, and
7 quote from documents that Zuffa and third parties have designated Confidential or Highly
8 Confidential (“Disputed Materials”) pursuant to the Revised Stipulation and Protective Order
9 issued by this Court on February 10, 2016 (ECF No. 217) (the “Protective Order”). In its Motion
10 to Seal, Zuffa asserted that the Disputed Materials are properly sealed under the compelling
11 reasons standard. As stated in Plaintiffs’ Opposition, Plaintiffs do not believe Zuffa’s
12 confidentiality designations meet the compelling reasons standard, and oppose sealing the
13 Disputed Materials for that reason. However, solely for the limited reason that the documents, as
14 they currently stand, are still designated Confidential or Highly Confidential, Plaintiffs do not
15 oppose Zuffa’s request in this joint motion that the documents—and references to them in
16 Plaintiffs’ Opposition—remain under seal, in accordance with the Protective Order, until the
17 Court has ruled on whether Zuffa has provided compelling reasons to seal them. Plaintiffs
18 continue to reserve their right to challenge Zuffa’s confidentiality designations pursuant to
19 Section 6.1 of the Protective Order.

20 Zuffa and Plaintiffs (collectively, the “Parties”) have stated their positions at length in
21 their respective briefing regarding the confidentiality and propriety of sealing descriptions of and
22 quotations from the Disputed Materials, but the Parties do not seek to re-litigate this issue for the
23 purposes of these filings. Having met and conferred on this issue, the Parties jointly move to file
24 the Disputed Materials and all references to them in Plaintiffs’ Opposition conditionally under
25 seal, pending the Court’s ruling on the Parties’ respective motions regarding sealing. Should the
26 Court determine that any of the materials under seal should not be sealed, the Parties will re-file
27 these materials on the public docket at that time.
28

1 Dated: November 20, 2018

Dated: November 20, 2018

2 **JOSEPH SAVERI LAW FIRM, INC.**

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By: /s/ Stacey K. Grigsby

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ATTESTATION OF FILER

The signatories to this document are myself and Kevin Rayhill, and I have obtained Mr. Rayhill's concurrence to file this document on his behalf.

Dated: November 20, 2018

/s/ Stacey K. Grigsby

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Joint Motion to Seal Plaintiffs' Opposition to Zuffa's Motion to Seal Zuffa's Reply in Support of its Motion for Summary Judgment was served on November 20, 2018 via the Court's CM/ECF electronic filing system addressed to all parties on the e-service list.

/s/ Roderick Crawford

Roderick Crawford